

Okanagan Timber Supply Area Timber Supply Review

Summary of Public Input

British Columbia Ministry of Forests
Vernon Forest District
2501 14th Ave.
Vernon, BC V1T 8Z1

British Columbia Ministry of Forests
Penticton Forest District
102 Industrial Place
Penticton, BC V2A 7C8

British Columbia Ministry of Forests
Salmon Arm Forest District
850 16th St. NE
100 Station Main
Salmon Arm, BC V1E 4S4

July, 2001

This is a summary of the public input received on the Timber Supply Review in the Okanagan Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Okanagan Timber Supply Area

Background

As part of the review of timber supply in the Okanagan Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Okanagan Timber Supply Area *Data Package* and *Information Report* in June 1999. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Okanagan TSA. A 30-day review period, ending July 5, 1999, was provided for the public to comment on these documents.

On July 13, 2000, the British Columbia Forest Service released the 2000 *Okanagan Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended September 11, 2000.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Okanagan TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Vernon Forest District office.

Public Review Process and Response

Salmon Arm, Vernon and Penticton district staff actively solicited public input on the Timber Supply Review in the Okanagan TSA through the following actions:

- direct mail-out of 80 copies of the *Information Report*, *Data Package* and *Public Discussion Paper* to key organizations in the Okanagan TSA or adjacent TSAs.
- the *Data Package* and the *Okanagan Timber Supply Area Analysis Report* were available at all three district offices and at the Kamloops Regional Office.
- members of the Okanagan-Shuswap Land and Resource Management Planning team were kept informed of the process of the Timber Supply Review.
- local media were informed of the release of the Timber Supply Review documents.

The three forest district offices received five written submissions on the *Data Package* and 11 submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Okanagan TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Okanagan Timber Supply Area

Data Package

Land Base Factors

Several submissions comment on factors that affect the size of the land base available for timber harvesting.

The Shuswap Okanagan Forest Association (SOFA) questions the exclusion of lands with certain ownership codes, noting these areas can contribute to timber supply unless the specific lease prohibits timber harvesting. The Interior Lumber Manufacturers' Association (ILMA) says many non-timber values must take into account the land base and forest structure both within the timber harvesting land base (THLB) and outside it. The association says it's unclear how these values will be modelled and questions if there's an intent to define a harvesting land base as well as a land base for non-timber values.

Riverside Forest Products states its agreement with the commitment to monitor Environmentally Sensitive Areas (ESAs) to see if harvesting is occurring in these types, while the ILMA questions this monitoring and asks if licensees were involved in the classification of ESAs.

With regard to sites with low timber growing potential, SOFA says these should be limited to lodgepole pine stands younger than 80 years and other species younger than 100 that have not reached the defined height. SOFA says older stands would be covered under problem forest types. Riverside says they are harvesting sites that will be excluded from the analysis and says this issue should be monitored.

With regard to problem forest types, SOFA says it should be made clear that the change from 60% hemlock to 70% hemlock to define hemlock-leading stands is not the result of a change in merchantability but reflects audit results that identified the misclassification of

many stands. The ILMA questions if any monitoring is occurring to determine if these problem forest types are currently being harvested and asks whether, if a certain type is large enough, the timber supply analysis could include a sensitivity to examine the potential for a partitioned cut.

SOFA expresses the opinion that, although the chief forester decided to include decadent hemlock (age class 8 and 9) in the last determination, this volume should be excluded from the base case. The association says adding this decadent wood, which is only suitable for pulp, to the AAC reduces overall wood supply and impacts mill viability.

SOFA notes that wildlife tree patches cannot be harvested and must be removed from the THLB. The association suggests a 3% area reduction.

With regard to land base withdrawals due to roads, trails and landings, the ILMA says the issue is growing space, not necessarily the surficial area occupied by these structures. The association requests further explanation of assumptions. Riverside Forest Products says the estimates for existing roads and landings appear reasonable, and the netdown for trails should be minimal given the increasing requirements for rehabilitation of trails. The company says the 1.7% netdown for future trails is too high.

Expected Rate of Growth and Productivity

Two forest industry submissions express the opinion that managed stand yield curves should be applied to all planted stands, not just those less than 21 years of age. The ILMA states its assumption that these curves will be applied to stands less than 21 years of age.

Three forest industry submissions question the Operational Adjustment Factors (OAFs) used in the analysis. The submissions identify several particular instances in which they believe the OAFs are too high.

Okanagan Timber Supply Area

The ILMA asks for an opportunity to discuss concerns about the lack of differentiation in minimum harvestable age between existing and regenerated stands.

Regeneration Delay

Three forest industry submissions question the four-year regeneration delay. They point out that in other TSAs the delay has been reduced to an average of two years or less. SOFA says prompt planting is now the norm and a two-year regeneration delay would be appropriate.

Forest Cover Requirements

Riverside says all forests should contribute to the forest cover requirements used to achieve various management objectives, not just forests in the THLB.

Two forest industry submissions say the cover requirements for visual quality should apply only to known scenic areas, as designated under the Okanagan Timber Harvesting Guidelines. They say this accurately reflects current management. The ILMA says the impact of these very restrictive assumptions cannot be known without further information and requests to know how the visual quality values were developed and justified.

With regard to ungulate winter range, the ILMA says only those areas legally identified under the Operational Planning Regulation should be modelled.

Riparian Areas and Watersheds

Three forest industry submissions raise several concerns with regard to riparian management areas. Their comments include:

- the overall riparian reserve of 12.4 metres is excessive and does not represent current management.
- the estimated 4,000 km of S1 (over 20 metre-wide) streams is questionable. Most land adjacent to these streams is privately

owned and therefore already withdrawn from the THLB.

- the retention values for the smallest streams are larger than those currently being used, due to windthrow risk. Riverside recommends reducing these values by one-half.
- SOFA says the distribution of fish-bearing streams should be based on the Wildstone Report, rather than assuming all streams have fish. The ILMA notes a lack of substantiation of the assumptions used by Wildstone.
- while the Riparian Retention Zone can be used to meet seral stage objectives, the retention portion of the Riparian Management Zone should not be used.
- the percentage retention for the Riparian Management Zone is the maximum and should not be interpreted as being the required or target level. More appropriate retention numbers are 25% for S1-S3, 13% for S4 and S5, and 3% for S6.

With regard to watershed areas, SOFA notes that the assumption that an eight-metre green-up height is needed for hydrologic recovery does not consider the partial recovery provided by shorter stands, and recommends using a six-metre height. Riverside questions if watershed areas have been correctly mapped and whether the maximum disturbance process is consistent with current approaches.

Non-Recoverable Losses

The ILMA states its assumption that values for unsalvaged losses were created using the process developed in Revelstoke.

Okanagan-Shuswap Land and Resource Management Plan (LRMP)

MLA Rick Thorpe asks what the impacts of the LRMP process will be. Riverside says the Introduction to the *Data Package* makes it sound as if the LRMP is current management and says it should only be considered in a

Okanagan Timber Supply Area

sensitivity analysis.

Socio-Economic Factors

Riverside notes its surprise that forestry, mining and agriculture no longer provide the majority of employment in the Okanagan TSA.

The regional district director for the Lower Similkameen says the Timber Supply Review does not meet the social, economic and environmental needs of the residents of that area. He says the past and present allocation of the AAC has left little opportunity for First Nations and other community members, and attempts to acquire a community forest licence have been unsuccessful. Frustration has led to First Nation blockades of harvesting areas, the director says, and the province must address these issues or remove this area from the AAC.

Timber Supply Area Analysis Report

Land Base Factors

The Little Shuswap Indian Band says the removal of areas from the THLB gives the impression of a higher productive capacity than may actually be present. The Band also says it can be argued that wildlife tree patches will eventually be harvested and are not permanently defined forest sites.

The BC Environment submission says it was their understanding the reduction for areas with regeneration problems was to be 100% not 90% as indicated in Table A-5.

Two submissions say the increase in land base due to the inclusion of problem forest types is questionable, since these types are often less likely to be logged. The Little Shuswap Band says more detail is needed on the new criteria used to define problem forest types and low productivity sites.

Forest Inventory Factors

Five submissions raise concerns regarding the forest inventory in this TSA. The concerns include:

- the age of the inventory information and the need to update it.
- the need for an inventory audit, particularly in the northern part of the TSA.
- the need for inventory work to address concerns about the impact of high-grading on remaining stand volumes, and to reflect the lack of full-profile logging over the last five years, particularly in the Interior Douglas-fir selection zone.
- because the remaining forests are on steep ground or in other sensitive areas, it's an illusion there's plenty of timber left. Companies have difficulty finding enough cutblocks.

Volume Estimates and Expected Rate of Growth

Two submissions say that 40 years of high-grading the best quality, highest volume and easiest to access timber has resulted in lower volumes in residual stands than indicated by the inventory. The remaining stands are located on steeper slopes, in higher elevations or on poor growing sites, which means they are more likely to contain lower value stands, according to these submissions.

The Little Shuswap Indian Band says it seems apparent a large information gap exists around the actual productivity of old-growth forests, and this gap renders the base case substantially inaccurate. The Band says a greater provincial effort is needed to improve incremental silviculture to achieve the projected increased yield from managed stands.

A submission from eight Registered Professional Foresters working in the Okanagan TSA says the analysis is very conservative regarding future stand productivity. The submission notes that adjustments based on Old

Okanagan Timber Supply Area

Growth Site Index studies were not considered despite significant gains in productivity that result from their application in other parts of the province. Three other submissions comment on uncertainties regarding these studies and the importance of calibrating their results for the Okanagan TSA. Two environmental groups say that as the studies only measured potential growth, management factors are likely to negate any possible gains that could be anticipated.

With regard to minimum harvestable ages, the Little Shuswap Indian Band says First Nations were not consulting in establishing these ages and it appears no consideration was given to the appropriate age for non-timber values, only for timber.

Regeneration Delay

Two environmental groups say steep hillsides and higher elevation areas hold many of the remaining forests in this TSA, and express concern that these sites are more difficult to regenerate, resulting in long-term disturbances.

Forest Cover and Green-up Requirements

Two environmental groups note that cutblock adjacency has been seriously limiting licensees and has also resulted in severe fragmentation of the landscape. They note the LRMP planning table agreed to lower green-up height to two metres, except in watersheds and viewsheds.

BC Environment (BCE) questions whether large lakes have been accounted for with appropriate riparian reserves.

BCE says Ungulate Winter Range has not been modelled accurately and three key assumptions do not reflect current management:

- the minimum height requirement should be 25 metres;
- it's unlikely that minimum height can be reached within 75 years in all forest types; and

- selection criteria should be used in the significant areas of overlap between the selection zone and ungulate winter range.

Biodiversity and Old Growth

An individual submission expresses concern at the loss of old and mid-aged trees on the THLB, saying this represents a loss of biodiversity across the landscape.

Three submissions express disagreement with the assumption that forests outside the THLB will continuously age and provide old growth representation. They say disturbances occur in these forests, such as fires which have proven extremely difficult to suppress. BCE says a correction factor is required because one can only assume that a fraction of non-THLB forests would meet the old seral definition over time.

Two submissions note that while the analysis indicates a preponderance of old growth, the landscape unit planning analysis shows very little old growth in many biogeoclimatic variants.

Okanagan-Shuswap LRMP

Six submissions say the recently ratified LRMP should be incorporated into the analysis, or the process delayed to allow for this. Two submissions note that the timber supply analysis done for the LRMP shows the new parks and improved management of non-timber values will not impact timber supply.

Non-Recoverable Losses

Three submissions question the significant reduction in non-recoverable losses despite the increase in fires and beetle attacks in this TSA. The Salvage Loggers Association says that with increased recovery, through a salvage partition, this lost volume could be significantly reduced.

Okanagan Timber Supply Area

Socio-Economic Impacts

The submission from the Salvage Loggers Association says that although forestry only accounts for 7.5% of employment in the TSA as a whole, that figure is much higher in the Lumby-Cherryville area. The association provides information on the economic impact of salvage logging, based on a one-year study, and describes increased opportunities that could be created for salvage work.

The regional district director for the Lumby rural area says over the past two years employment and the tax base have been severely reduced by the closure of the Weyerhaeuser mill and the announced closure of Riverside's stud mill. Unemployment is in the 25% range, the director says, and social problems have significantly increased. The regional district has supported a community forest proposal as a way to diversify the economy, according to the director.

Four submissions question whether the socio-economic analysis accounted for the fact that 40% of the wood supply comes from non-TSA land. For example, the submissions question the statements in Section 7.3.1 regarding impacts from a decreased AAC based on the current quantity of wood billed (which includes non-TSA wood).

Three submissions make the following comments about socio-economic impacts:

- the economic role of forestry is decreasing but the analysis does not look at how other economic sectors benefit from non-timber forest values. U.S. studies have shown that local economies benefit more from forest protection than forest liquidation.
- it appears both employment and income levels are not directly tied to AAC levels as the analysis suggests. For example, the closure of two Lumby mills despite a constant AAC.

- the long-term economic and social impacts of the current policy of liquidation of nearly all primary forests in the THLB have not been adequately addressed.

Environmental Objectives

Four submissions express the opinion that the analysis does not adequately account for non-timber, environmental values or accurately assess the environmental implications of the base case or alternative rates of logging.

Other Comments

Many submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

Six submissions comment in some detail about the process and/or methodology of the Timber Supply Review. These comments include:

- the review process appears to be sound and comprehensive.
- the lack of detailed analysis implies the expedient delivery of inaccurate information is more important than determining a truly sustainable harvest level.
- the *Data Package* does not provide sufficient specific data to permit a fair evaluation or understand impacts.
- to reflect current management, the base case should only include legal requirements. Others, such as landscape units or protected areas, should only be examined in a sensitivity analysis.
- the process does not adequately account for non-timber values or the fact that much of the remaining harvestable timber is on environmentally sensitive and higher elevation sites.
- a spatial analysis should be done to test the predictions of the analysis.
- predicting the future is fraught with

Okanagan Timber Supply Area

problems, from climate change to the impact of forest certification on markets.

In addition, four submissions suggest the need to consider dividing the TSA into two areas (the Shuswap and the Okanagan).

Harvest Levels and Partitions

Ten submissions comment on the harvest level to be determined by the chief forester.

Six submissions express opposition to any increase in harvest levels, because of the unreliability of forest inventories and because of the need to first resolve outstanding issues (e.g., designation of Old Growth Management Areas, increased riparian retention, etc.) through the LRMP process. Three of these submissions say that when the LRMP is completed and new operating areas are defined, if licensees continue to have trouble locating timber, the AAC should be reduced.

Three submissions express support for an increased AAC, for the following reasons:

- to allow for a community forest licence in the Lumby area, thereby creating diversification, business opportunities and stability.
- the age of the stands in the THLB means increased harvesting should occur or the volumes will be lost to disease, insects, etc.
- the anticipated increase in future productivity, based on results of the Old Growth Site Index studies.

The United Salvage Loggers Association requests a partition of the new AAC to be allocated to the salvage program. The association says expanding the program back to traditional levels will help offset economic hardships from mill closures, create local socio-economic benefits, and provide wood for value-added plants as well as major licensees.

First Nations

The Little Shuswap Indian Band says the timber supply analysis fails to consider the impacts of treaty negotiations and recent Court rulings confirming aboriginal rights and title to lands and resources. As well, the Band says the analysis does not consider netdowns for areas of high cultural sensitivity, contemporary traditional uses, First Nation access to resources through inherent rights, integration of traditional ecological knowledge into planning, or the myriad of other pressing First Nations concerns regarding the forest resource and associated economic benefits.

The Westbank First Nation demands an immediate end to the Timber Supply Review, and instead calls for resolution of First Nation issues. This submission notes that all land and resources within the Okanagan TSA have encumbered title, and any infringement on or alteration of land and resources is detrimental to the successful conclusion of land claim negotiations. The Westbank First Nation says no meaningful First Nation participation in the Timber Supply Review has occurred, and notes the need for resources if sound decisions are to be made when referrals such as this occur. According to their submission, the Westbank First Nation are proceeding toward implementation of the 1997 Delgamuukw decision, which includes tests of aboriginal rights and title, as well as planning for a Westbank community forest.

Appendix 1

Submissions received by the Salmon Arm, Vernon and Penticton Forest Districts

Submissions received on the Data Package

Government

Rick Thorpe, MLA, Okanagan-Penticton

Roger Mayer, Director Area G, Regional District of Okanagan Similkameen

Forest Industry

Shuswap Okanagan Forest Association

Interior Lumber Manufacturers' Association, Kelowna

Riverside Forest Products Ltd., Lumby

Submissions received on the Timber Supply Analysis Report

Government Agencies

BC Environment, Southern Interior Region

Local Government

L.T. Deuling, Director Area D, Regional District of North Okanagan

First Nations

Little Shuswap Indian Band, Chase

Westbank First Nation, Kelowna

Interest Groups

Canadian EarthCare Society, Kelowna

Turtle Island Earth Stewards, Salmon Arm

Shuswap Environmental Action Society, Chase

Community Forest Committee, Lumby

Forest Industry

Registered Professional Foresters (8), working in Okanagan TSA

United Salvage Loggers Assoc. of B.C.

General Public

One individual submission

